

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

ELLEN W. GERBER; PEARL BERLIN;
LYN MCCOY; JANE BLACKBURN;
ESMERALDA MEJIA; CHRISTINA
GINTER-MEJIA, for herself and as guardian
ad litem for J.G.-M., a minor;

Plaintiffs,

v.

CIVIL ACTION NO. 1:14-cv-00299

ROY COOPER, in his official capacity as the
Attorney General of North Carolina; JEFF
THIGPEN, in his official capacity as the
Register of Deeds for Guilford County;
DONNA HICKS SPENCER, in her official
capacity as the Register of Deeds for Catawba
County; JOHN W. SMITH, in his official
capacity as the Director of the North Carolina
Administrative Office of the Courts; AL
JEAN BOGLE, in her official capacity as the
Clerk of the Superior Court for Catawba
County;

Defendants

NOTICE OF SPECIAL APPEARANCE

Pursuant to Local Rule 83.1(d), please take notice of the special appearance of Rose

A. Saxe of the American Civil Liberties Union Foundation as counsel of record for the
Plaintiffs in the above-captioned civil action.

Ms. Saxe certifies that she is an active member in good standing of the bar of the
State of New York. Ms. Saxe further certifies that she understands that by entering an

appearance she submits to the disciplinary jurisdiction of the Court for any misconduct in connection with the above-captioned civil action for which she is specially appearing and that she will ensure that an attorney who is familiar with the case and has authority to control the litigation will be at all conferences, hearings, trials and other proceedings.

Ms. Saxe is appearing in the above-captioned civil action in association with Jonathan D. Sasser and Jeremy M. Falcone. Mr. Sasser and Mr. Falcone are active members in good standing of the bar of this Court. Mr. Sasser and Mr. Falcone certify that they remain responsible to this Court for the conduct of the litigation and acknowledge that one of them must sign all pleadings and papers, except for certificates of service. Mr. Sasser and Mr. Falcone further certify that one of them will be present during pretrial conferences, potentially dispositive proceedings and at trial.

This 25th day of August, 2014.

/s/ Rose A. Saxe
Rose A. Saxe
American Civil Liberties Union
Foundation
125 Broad Street
New York, New York 10004-2400
Telephone: (212) 549-2500
Facsimile: (212) 549-2646
rsaxe@aclu.org

Amy E. Richardson
N.C. State Bar No. 28768
2009 Fairview Road
#6220
Raleigh, NC 27628
Telephone: (919) 429-7386
Facsimile: (202) 730-1301
arichardson@harriswiltshire.com

Jonathan D. Sasser
N.C. State Bar No. 10028
Jeremy M. Falcone
N.C. State Bar No. 36182
P.O. Box 33550
Raleigh, North Carolina 27636
Telephone: (919) 865-7000
Facsimile: (919) 865-7010
jsasser@aclunc.org
jfalcone@aclunc.org

Garrard R. Beeney
David A. Castleman
C. Megan Bradley
William R.A. Kleysteuber
SULLIVAN & CROMWELL
LLP
125 Broad Street
New York, New York 10004-
2498
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
beeneyg@sullcrom.com
castlemand@sullcrom.com
bradleyc@sullcrom.com
kleysteuberr@sullcrom.com

Of Counsel:
Elizabeth O. Gill
American Civil Liberties Union Foundation 39
Drumm Street
San Francisco, California 94111-4805
Telephone: (415) 343-1237
Facsimile: (415) 255-1478 egill@aclunc.org

Christopher Brook
N.C. State Bar No. 33838
ACLU of North Carolina
P.O. Box 28004
Raleigh, North Carolina 27611-8004
Telephone: (919) 834-3466
Facsimile: (866) 511-1344
cbrook@acluofnc.org

Attorneys for the plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2014, I electronically filed the foregoing **NOTICE OF SPECIAL APPEARANCE** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record for Defendants.

/s/ Rose A. Saxe
Rose A. Saxe
American Civil Liberties Union
Foundation
125 Broad Street
New York, New York 10004-2400
Telephone: (212) 549-2500
Facsimile: (212) 549-2646
rsaxe@aclu.org